

1      **GUTRIDE SAFIER LLP**

2      Seth A. Safier (State Bar No. 197427)  
3      [seth@gutridesafier.com](mailto:seth@gutridesafier.com)  
4      Marie A. McCrary (State Bar No. 262670)  
5      [marie@gutridesafier.com](mailto:marie@gutridesafier.com)  
6      Anthony J. Patek (State Bar No. 228964)  
7      [anthony@gutridesafier.com](mailto:anthony@gutridesafier.com)  
8      Kali R. Backer (State Bar No. 342492)  
9      [kali@gutridesafier.com](mailto:kali@gutridesafier.com)  
10     100 Pine Street, Suite 1250  
11     San Francisco, CA 94111  
12     Telephone: (415) 639-9090  
13     Facsimile: (415) 449-6469

14     *Attorneys for Plaintiffs*

15      **KELLEY DRYE & WARREN LLP**

16     Becca J. Wahlquist (SBN 215948)  
17     [bwahlquist@kelleydrye.com](mailto:bwahlquist@kelleydrye.com)  
18     350 South Grand Avenue, Suite 3800  
19     Los Angeles, CA 90071  
20     Telephone: (213) 547-4900  
21     Facsimile: (213) 547-4901

22     *Attorneys for Defendant Crocs, Inc.*

23      **UNITED STATES DISTRICT COURT**  
24      **NORTHERN DISTRICT OF CALIFORNIA**

25      **MARTHA VALENTINE, et. al.**

26      Case No. 3:22-cv-07463-TLT-PHK

27      Plaintiffs,

28      **JOINT STATUS REPORT PURSUANT TO**  
29      **DKT. NO. 53**

30      **CROCS, INC.,**

31      Hon. Peter H. Kang

32      Defendant.

33      CASE NO. 3:22-CV-07463-TLT

34      **JOINT STATUS REPORT PURSUANT TO DKT. NO. 53**

35      Error! Unknown document property name.

1           Counsel for Plaintiffs Martha Valentine, Ruby Cornejo, and Tiffany Avino (“Plaintiffs”)  
2 and counsel for Defendant Crocs, Inc. (“Crocs”) (collectively, the “Parties”) submit this Joint  
3 Status Report pursuant to Dkt. No. 53 regarding scheduling the 30(b)(6) depositions.

4           The Parties had a Case Management Conference with Judge Thompson on Thursday,  
5 December 14, 2023, during which the Parties discussed their renewed request for a 90-day  
6 extension of all deadlines. *See* Dkt. 55 (Joint Case Management Statement, describing the need for  
7 extension). Judge Thompson indicated at the hearing that she would likely grant that request.

8           On December 15, 2023, Judge Thompson issued a minute order granting the discovery  
9 deadline extension. That order read as follows:

10           **ORDER GRANTING DISCOVERY DEADLINE EXTENSION.**  
11           **The parties requested a 90-day extension to the discovery**  
12           **deadlines. The Court GRANTS the extension. The deadline**  
13           **for fact discovery has been extended from August 6, 2024 to**  
14           **November 5, 2024. Likewise, the extension for expert**  
15           **discovery is extended from September 30, 2024 to December**  
16           **30, 2024.**

17           Because the Order did not specifically mention the extension of the timeframe for class  
18           discovery (currently set to have a January 24 cut-off), the Parties wrote to the Court asking for  
19           clarification that the 90-day extension applies to all discovery. As of the time of this filing, the  
20           Parties have not received a reply.

21           The parties have agreed that if class discovery is extended, Rule 30(b)(6) depositions will  
22           take place in February 2024, on specific dates to be agreed to by the Parties at least by January 8,  
23           2024.

24           The parties have agreed that if class discovery is not extended, the 30(b)(6) depositions will  
25           take place on January 11 and January 16-19, 2024. Crocs has already provided its grouping of  
26           topics for the five planned 30(b)(6) witnesses, and will identify which witness will be offered on  
27           which day no later than December 22, 2024, if class discovery is not extended.

28           DATED: December 18, 2023

1        *s/Kali R. Backer*

2        Seth A. Safier (State Bar No. 197427)  
3        [seth@gutridesafier.com](mailto:seth@gutridesafier.com)  
4        Marie A. McCrary (State Bar No. 262670)  
5        [marie@gutridesafier.com](mailto:marie@gutridesafier.com)  
6        Hayley Reynolds (State Bar No. 306427)  
7        [hayley@gutridesafier.com](mailto:hayley@gutridesafier.com)  
8        Kali R. Backer (State Bar No. 342492)  
9        [kali@gutridesafier.com](mailto:kali@gutridesafier.com)  
10      GUTRIDE SAFIER LLP  
11      100 Pine Street, Suite 1250  
12      San Francisco, CA 94111  
13      Telephone: (415) 639-9090  
14      Facsimile: (415) 449-6469

15      *Attorneys for Plaintiffs*

16        */s/ Becca J. Wahlquist*

17        Becca J. Wahlquist (SBN 215948)  
18        [bwahlquist@kelleydrye.com](mailto:bwahlquist@kelleydrye.com)  
19        KELLEY DRYE & WARREN LLP  
20        350 South Grand Avenue, Suite 3800  
21        Los Angeles, CA 90071  
22        Telephone: (213) 547-4900  
23        Facsimile: (213) 547-4901

24      *Attorneys for Defendant Crocs, Inc.*

25      **ATTESTATION**

26      Pursuant to Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose  
27      behalf the filing is submitted, concur in the filing of this stipulation and have authorized the filing  
28      of this stipulation.

29      DATED: December 18, 2023

30      Respectfully submitted,

31        */s/ Becca Wahlquist*  
32        Becca Wahlquist (SBN 215948)